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United States District Court
Northern District of California
San Francisco Division

VINCENT TURNER,

Petitioner,

v.

FRED FOULK, Warden, High Desert
State Prison

Respondent,

PEOPLE OF THE STATE OF CALIFORNIA,

Real Party in Interest.

No. **3:13-CV-05718-VC**

MOTION AND DECLARATION OF GOOD
CAUSE TO PERMIT LATE FILING OF
TRAVERSE AND REPLY MEMORANDUM

MOTION AND DECLARATION OF GOOD CAUSE TO PERMIT LATE FILING OF
TRAVERSE AND REPLY MEMORANDUM

I, Manisha Daryani, declare under penalty of perjury as follows:

1. On December 10, 2013, petitioner filed a petition for writ of habeas corpus.
Respondent filed its brief on June 5, 2014.

2. Petitioner requested and received three extensions of time to file the traverse and reply memorandum for a total of 97 days. The traverse and reply memorandum were due on Friday, October 10, 2014.

3. I was able to finish the reply memorandum on that date, but after 5:00 p.m. When I attempted to e-file the documents, I learned that ECF was down for maintenance until noon today, Monday, October 13, 2014.

I declare under penalty of perjury that the facts set forth in this motion are true and correct. Executed in Oakland, California, on Monday, October 13, 2014.